

EXHIBIT 8: SCIEGEN SEARCH TERM LIST

(*204774*)
EIR or "establishment inspection report"
OAI or "official action indicated"
"voluntary action indicated"
*diethylamine or "**diethyl amine"
*dimethylamine or "**dimethyl amine"
(*dimethylformamide or DMF) AND (<Drug Name>)
*dimethylmethanamide
ghost
NDEA
NDMA AND (<Drug Name>)
nitra
nitrite
nitrosa
nitroso
NMBA
trosomine
(Form483) or (Form /3 483) or (483 /3 letter) or (483 /3 warn*) or (704 pre/3 b)
C2H6N2O or "(CH3)2NN=O" or "CH32NN=O" or "(CH3)2NC(O)H" or CH32NCOH or C3H7NO or "(CH3CH2)2NH" or CH3CH22NH or C4H11N or "(CH3)2NH" or CH32NH or C2H7N or "(C2H5)2NNO" or C2H52NNO or C4H10N2O
carcin*
deviat* /5 cancer* or deviat* /5 toxic or deviat* /5 hazard* or deviat* /5 fatal
FDA /10 warning
gene* /3 mutat*
genotoxic*
solvent /5 cancer* or solvent /5 toxic or or solvent /5 hazard* or solvent /5 fatal
solvent* /5 contamin*
(test* /5 canc*) AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>))
tetrazol*

<term> (no modifiers)^

^Except if run against custodians in management over more than one facility in which case to be run as indicated in agreed-to procedure.

Last Name	First Name
Agrawal	Atul
Akhtar	Saleem
Amin	Pankaj
Arasu	
Arista	
Arroyo	
Baker	Peter
Barreto	
Barrowcliff	
Bellamy	
Bernard	Tonia
Bizjak	
Boyd	Justin
Bretz	Paula
Brown	Darren
Cartwright	
Casale	
Chapman	Johnathan
Charity	Antony
Chester	Bonita
Clausen	
Cosgrove	
Cruz	
Dezan	
Dickinson	Gwyn
Dobbin	
Dombrowski	
Donald	Steven
Dong	Eric
Eban	
Ernst	
Estrella	Maria
Etminan	
Ford	Susanna
Frazier	Laurie
Gavini	
George	Jogy

Last Name Standalone UNLESS IF First Name
 Exists, THEN (Last Name /3 First Name) OR
 (Last Name AND <Regulatory Modifiers>)

Ghoshal	Rabin
Gidado	
Goga	
Goga	Michael
Hall	Patrice
Hallas	
Harouaka	
Hebert or Della or Dellareese	
Hicks	Kellia
Higgins	Brooke
Huaren	
Hustedt	
Johansen	
Jones	Latoria
Karapetyan*	
Khan	Farhana
Khurana	Sangeeta
Kristensen	
Lopez Rubet	
Maldonado	
Mankind	
Mansournia	
Marcisin	
Martinez	Miguel
Mason	James
Mathew or Mathews	Lata
Mayasandra	Pal
Melende	
Min	Ko
Mistler	
Motamed	
Motta	
Mueller	
Narula	
Navas	
Nguyen	Truong
Oladimeji	
Panicker	
Patel	Nayan
Philopoulos	
Pitts	Simone
Podaralla	Satheesk
Pottgard	
Priester	
Pyramides	
Quartarolo	

Ray	Marcus
Razzaghi	Frederick
Roberts	Daniel
Roy	Melissa
Schwartz	Paul
Shah	Dipesh
Skanchy	
Srivasta	
Srivastava	Rajiv
Stieg	
Sweeney	
Szestypalow	
Tomasso	
Ulysse	
Upadhyay	Pratik
Verdel	
Wakijira	Chaltu
Wang	Zhao
Warnick	
Xu	Atul
Young	Rochelle
Yuscius	
Zaklady	
Zamil	
Zamperini	
Zhen Zhou	

("adverse event*" or AER) and (<drug name> or <solvents> or <facility names>)
"changes being effected"
"prior approval supplement"
adulterat*
alert*
CAPA or corrective pre/3 "preventive action"
CFR or eCFR or "code of federal regulations" or USC or "United States Code" or "Title 21"
Citizen* pre/3 Petition
(Establishment pre/3 Inspection)
import* /3 (ban or alert or restrict*)
inadequat*
inspect*
investigat*
major /3 change
(master /3 file) and (<drug name> or <solvents>)
minor /3 change
moderate /3 change
Monthly /3 update
(official pre/3 action* /4 indicat*)
observation*
OOS or "out of spec*" or "out-of-spec"
OOT or "out-of-trend" or "out of trend"
PADER* and (<drug name> or <solvents> or <facility names>)
VAI or (voluntary pre/3 action* /4 indicat*)
violat*
warn*

<Term> AND (<Drug Name> OR (<Solvents>
AND NOT <other drug names>) OR <regulatory
modifiers> OR <facility names>)

(bottle pre/2 lies) or Eban
bury or burie* or conceal*
cGMP* or (current pre/5 manufacturing) or GMP*
"cover up*" or coverup* or "cover-up"
crash* or disaster*
data /4 integrity or data /4 reliabl*
delet* or destroy* or remov* or trash* or shred*
hide* or suppress*
whistleblow*

<Term> AND (<Drug Name> OR (<Solvents> AND
NOT <other drug names>) OR <regulatory
modifiers> OR <inspect> OR <manufacturing
modifiers> OR <medical modifiers> OR <facility
names>)

"anion-exchange" or anionexchange or "anion exchange"
"ion-exchange" or ionexchange or "ion exchange"
PCRC
aberran*
abnorm*
ALS
bioequiv*
CAPA or corrective pre/5 action
Chromato*
complain*
contami*
degradant* or impurit*
detect*
El-MS or EL-MS or "electron ionization"
elude*
fail*
fatal*
GC or "GC-FID" or GCMS or "GC-MS"
hazard*
headspace
heat
HPLC-UV
HS
incomplet* /5 data*
LCMS
mass spectro*
method /5 qualification
noise*
noti* w/5 pharm*
obscure*
observation*
peak*
press /4 release
preventative /5 action
problem*
puri*
quality

<Term> AND (<Drug Name> OR
 (<Solvents> AND NOT <other drug
 names>) OR <manufacturing modifiers>)

recall*
repe* /4 error*
residu*
retrospec*
risk*
signal*
spectro*
spike*
suitab*
toxic*
unknown* or unk or unks
validat*

"IC route" OR "IC process" OR "I-C route" OR "I-C route" OR "I-C process" OR "I-C" OR "IB route" OR "IB process" OR "I-B route" OR "I-B process" OR "I-B"
assay*
assessment*
batch /5 records
biocompat*
byproduct*
CAPA or corrective pre/3 "preventive action"
certificat*
change* /3 control*
change* /5 process*
COA or certificat* pre/3 analys*
concentra*
condensa*
conversion*
critical /4 change
crude*
deviat*
diastereo*
discrepanc*
error*
esterficat*
expir*
formaldehyde
malfunct*
material* /3 loss*
moiety or moieties
process /5 change
quench*
reagent*
reclaim*
recover*
recycl*
repack* or "re-pack"
resal*
resell*
reuse*
ring*
solvent*
suppress*
TEA or Triethyl*
temperature

<Term> AND (<Drug Name> OR (<Solvents>
AND NOT <other drug names>))

TIN or Tributyl* yield*

bladder*
blood*
cancer* or precancer* or pre-cancer*
colon*
death* or dead or fatal
esophag*
gastro*
intestin*
kidn* or renal*
laten*
leukemia*
liver*
lymphoma*
muta*
myeloma*
NHL or non-hodgkin*
toxicolog*
onset*
oncolog*
ovar*
pancrea*
prostate*
stomach*

<Term> AND (<Drug Name> OR (<Solvents>

AND NOT <other drug names>))

AWP or "average wholesale price" or WAC or "wholesale acquisition cost"
best /3 pric*
bulk /3 suppl*
impairment
IRR
manufactur* /3 cost*
marginal /5 cost*
market* /5 share*
net /5 profit*
net /5 valu*
NPA
NPV
rate /10 return
rebate*
sourc* w/5 agree* or sourc* w/5 anal* or sourc* w/5 contract* or sourc* w/5 forecast* or sourc* w/5 plan* or sourc* w/5 strat*
suppl* w/5 agree* or suppl* w/5 anal* or suppl* w/5 contract* or suppl* w/5 forecast* or suppl* w/5 plan* or suppl* w/5 strat*
SWOT or (strength pre/7 threat*)
writ* pre/5 off
(ABDC or Amerisource* or "American Health Packaging" or AHP) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(AG) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or gross or gross or loss)
(amerisource*) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(ANDA) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(ASB) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)

<Term> AND (<Drug Name> OR (<Solvents>

AND NOT <other drug names>))

(Authorized /4 generic) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share)
(average or avg) AND (pric* or cost* or margin* or profit* or revenue*)
(avg) AND (pric* or cost* or margin* or profit* or revenue*)
(boehringer ingelheim) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or
(cardinal) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(contract) AND (distrib* or PBM)
(cost*) AND (analy* or forecast* or plan* or strat*)
(CVS*) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(Epic) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(ESI) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(Express*) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(IMS) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or
(IQVIA) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share
(Kroger) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or loss)
(mckesson) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or loss)
(operat* w/5 margin*) AND (margin* or profit*)
(Optum*) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or loss)
(pric*) AND (decreas* or increas* or list* or strat* or expect* or project*)
(recall) AND (loss or impairm* or write* or reimburs* or indemn* or charg* or

(Redoak) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or loss)
(retail) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or
(Rite*) AND (pric*)
(sales) /5 (expect* or project*)
(var*) /5 (cost*)
(variable) /5 (cost*)
(Walgreen* or WBDA) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(Walmart) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)

Alembic
ABDC or Amerisource* or "American Health Packaging" or AHP
Amerigen
ANDA
Auro* or APL or APUSA
boehringer ingelheim
Bristol
Camber
Cobalt
distribut*
Forest
Hetero
Huahai
Indoco
Ivax
Jubilant
Lantech*
Macleod*
Matrix
Mylan
Novartis
Par
Princeton
Qualanex
Ranbaxy
Sandoz
Syncore
Synthon
Teva
Torrent
Unichem
Watson
Zhejiang*
ZHP

<Term> AND (<Drug Name> OR (<Solvents>
AND NOT <other drug names>))

Irbesartan
Avapro
Aprovel
Avalide
HCT or HCTZ
sartan or sartans

<drug names modifiers>

"sodium azide"
formaldehyde
-N3
xylene
acid*
aqueous*
chloramin*
HNO2
hydrochlor*
N-3*
NaNO*
"sodium nitrite"
tolue*
Tributyl* or TIN
Triethyl* or TEA or "tri ethy;*" or "tri-ethyl*"

<solvents modifiers>

"Abbreviated New Drug Application" or ANDA
CDC or "Centers for Disease Control"
CDER or "Center for Drug Evaluation and Research"
DEA or "Drug Enforcement Administration" or "Drug Enforcement Agency"
"Environmental Protection Agency" or EPA or USEPA or "US-EPA" or "1200 Pennsylvania
"Food and Drug Administration" or FDA or USFDA or "US-FDA" or "College Park"
NIH or "National Institutes of Health"

<regulatory modifiers>

Agency
inspect
regulat*

<inspect modifiers>

backup /3 data
impurit* and degradant*
recall*
residu*
solvent*
spike*
test*
unknown /3 peak or unknown /3 spike or unknown /3 impurit* or unknown /3 contamin*

<manufacturing modifiers>

"adverse event*" or AER*
bladder*
blood*
cancer* or precancer* or pre-cancer*
colon*
death* or dead or fatal
esophag*
gastro*
intestin*
kidn* or renal*
laten*
leukemia*
liver*
lymphoma*
MedWatch* or "Safety Information and Adverse Event Reporting"
muta*
myeloma*
NHL or non-hodgkin*
toxicolog*
onset*
oncolog*
ovar*
PADER*
pancrea*
prostate*
stomach*

<medical conditions modifiers>

analys*
AWP
cost*
decreas*
distrib*
expect*
gross
impairm*
increas*
indem*
list*
loss*
margin*
market*
net
PBM
plan
pric*
profit*
project*
recall*
revenue*
share*
stock*
strat*
WAC
write*

<economic modifiers>

"Unit 1" or Unit I" or Unit-1" or Unit-I" or 3004021253"
or "Unit 9" or Unit IX" or "Unit-IX" or "3006370489"
OR "3008298016 OR "Building 1" OR "Building 2"

<facility names modifiers>

SEARCH TERMS PROCEDURE

1. Search Terms

The Primary Search Terms and Modifiers lists given above shall be used for searching of custodial records subject to the procedure set forth herein.

2. Standalone Terms

a) The following terms shall remain on the standalone terms list but can be tested and refined further if a need is shown after documents are collected and preliminarily reviewed:

- i. *diethylamine or "*diethyl amine"
- ii. *dimethylamine or "*dimethyl amine"
- iii. *dimethylformamide or DMF
- iv. *dimethylmethanamide
- v. *ghost*
- vi. *NDEA*
- vii. *NDMA*
- viii. *nitra*
- ix. *nitrite*
- x. *nitrosa*
- xi. *nitroso*
- xii. *trosomine*
- xiii. C₂H₆N₂O or "(CH₃)₂NN=O" or "CH₃2NN=O" or "(CH₃)₂NC(O)H" or CH₃2NCOH or C₃H₇NO or "(CH₃CH₂)₂NH" or CH₃CH₂2NH or C₄H₁₁N or "(CH₃)₂NH" or CH₃2NH or C₂H₇N or "(C₂H₅)₂NNO" or C₂H₅2NNO or C₄H₁₀N₂O
- xiv. tetrazol*
- xv. gene* /3 mutat*
- xvi. genotoxic*
- xvii. carcin* (but may modify if needed)
- xviii. deviat* /5 cancer* or deviat* /5 toxic or deviat* /5 hazard* or deviat* /5 fatal (but may modify if needed)
- xix. FDA /10 warning (but may modify if needed)
- xx. solvent /5 cancer* or solvent /5 toxic or solvent /5 hazard* or solvent /5 fatal (but may modify if needed)
- xxi. solvent* /5 contamin* (but may modify if needed)
- xxii. Valisure* (but may modify if Valisure comes up for a reason other than its role in relation to detecting nitrosamines).

b) The following terms (1) when used against data of custodians working only at a particular facility would be run as standalone terms; and (2) when used against data of custodians in management over more than one facility would be run with <term> AND (<Drug Name> OR <Solvents> OR <Facility Name>), but can be tested and refined further to be <term> AND <facility name> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>)) if needed:

- i. EIR or “establishment inspection report”
- ii. OAI or “official action indicated”
- iii. “voluntary action indicated”
- iv. (Form483) or (Form /3 483) or (483 /3 letter) or (483 /3 warn*) or (704 pre/3 b)

3. Manufacturing, Medical Conditions, Economic Terms, Entities

- a) The search string for these primary terms categories shall be: <Term> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>)) where <other drug names> will be an agreed to list of the names of each other non-nitrosamine-containing drug manufactured by the defendant running the modifiers;
- b) Plaintiffs will identify a subset of these terms that they believe need to be run with <Term> AND (<Drug Name> OR <Solvents>) instead (i.e. without excluding other drug names), which will be subject to testing and sampling as to the differential results;
- c) Any terms still in dispute after such testing, sampling, and meet and confers will be promptly brought to the Court for resolution by August 31, 2023. After that

opportunity, terms shall remain on the relevant list but can be tested and refined further if need is shown after documents are collected.

4. QA-Testing, cGMP, and Regulatory

- a) The search string for these shall be: <Term> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>) OR [other categories of modifiers]);
- b) The Parties will negotiate any further modifications in either direction (e.g. narrowing or broadening), if needed, once documents have been collected and initially reviewed.
- c) Any terms still in dispute after such testing, sampling, and meet and confers will be promptly brought to the Court for resolution.

5. Terms Completely Objected to by Defendants

- a) Defendants will run hit counts using the search string agreed upon for each particular term for those terms Defendants objected to (highlighted in yellow on search terms lists);
- b) The hit counts will be reviewed, documents sampled if necessary, and the Parties will meet and confer on how to narrow the terms if needed;
- c) If the Parties cannot agree, they will promptly bring the issue to the Court for resolution by August 31, 2023. After that opportunity, terms shall remain on the relevant list but can be tested and refined further if need is shown after documents are collected.

6. List of <Other Drug Names>

a.) As described above, certain strings will include a list of other, non-sartan drugs manufactured by the defendant. Here, the parties agree that list will consist of the following drugs:

1. Celecoxib
2. Omeprazole
3. Rivaroxaban
4. Apixaban
5. Esomeprazole
6. Mesalamine